

Objection Deadline: September 24, 2012 at 5:00 p.m. (prevailing Eastern Time)  
Hearing Date: TBD

DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, NY 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 607-7984  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
Damian S. Schaible  
Paul S. Mishkin

*Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PINNACLE AIRLINES CORP., *et al.*,**

**Debtors.**

**Chapter 11**

**Case No. 12-11343 (REG)**

**(Jointly Administered)**

**NOTICE OF DEBTORS' MOTION TO REJECT COLLECTIVE  
BARGAINING AGREEMENTS WITH THE AIR LINE PILOTS  
ASSOCIATION, INTERNATIONAL AND THE ASSOCIATION OF  
FLIGHT ATTENDANTS-CWA PURSUANT TO 11 U.S.C. § 1113**

Pinnacle Airlines Corp. (“Pinnacle” or the “Company”) and its affiliated debtors (the “Debtors”) respectfully move, pursuant to 11 U.S.C. § 1113(c), for an Order (1) authorizing rejection of collective bargaining agreements with (a) the Air Line Pilots Association, International (“ALPA”) and (b) the Association of Flight Attendants-CWA (“AFA”); and (2) implementing the terms of Pinnacle’s Section 1113 proposal.

### **BACKGROUND AND JURISDICTION**

1. On April 1, 2012 (the “Petition Date”), each Debtor commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors’ cases are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

2. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and may be heard and determined by the Bankruptcy Court. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicate for the relief requested herein is Section 1113 of the Bankruptcy Code.

### **RELIEF REQUESTED**

4. By this motion (the “Motion”), and for the reasons articulated in the Memorandum of Law filed under seal contemporaneously herewith, the Debtors respectfully request that this Court grant an Order (1) authorizing it to reject its collective bargaining

agreements with (a) ALPA and (b) AFA; and (2) implementing the terms of Pinnacle's Section 1113 proposal.

**NOTICE**

5. Consistent with the Order Granting Debtors' Motion for an Order Establishing Certain Notice, Case Management and Administrative Procedures entered on April 3, 2012 [ECF No. 42] (the "Debtors' CMO"), the Debtors will serve notice of this Motion on (a) counsel to ALPA, (b) counsel to AFA, (c) the Core Parties and (d) the Non-ECF Service Parties (as those terms are defined in the Debtors' CMO). All parties who have requested electronic notice of filings in these cases through the Court's ECF system will automatically receive notice of this motion through the ECF system no later than the day after its filing with the Court. A copy of this motion and any order approving it will also be made available on the Debtors' Case Information Website (located at <http://dm.epiq11.com/Pinnacle>). In light of the relief requested, the Debtors submit that no further notice is necessary. Pursuant to paragraph 22 of the Debtors' CMO, if no objections are timely filed and served in accordance therewith, the relief requested herein may be entered without a hearing.

**NO PREVIOUS REQUEST**

6. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

**CONCLUSION**

WHEREFORE the Debtors respectfully request that the Court grant the Debtors' Motion for an order authorizing it to reject its collective bargaining agreements with ALPA and AFA pursuant to Section 1113 of the Bankruptcy Code and such other and further relief as the Court deems just and proper.

Dated: New York, New York  
September 13, 2012

By: /s/ Paul S. Mishkin  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
Damian S. Schaible  
Paul S. Mishkin

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